

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
)
Advanced Television Systems)
and Their Impact upon the)
Existing Television Broadcast)
Service - Sixth Further Notice)
of Proposed Rulemaking)

MM Docket No. 87-268

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TO: The Commission

COMMENTS OF
JOVON BROADCASTING CORPORATION

Jovon Broadcasting Corporation ("Jovon"),
licensee of Station WJYS-TV, Channel 62, Hammond,
Indiana, hereby submits brief comments in the above-
captioned Sixth Further Notice of Proposed Rulemaking
("NPRM") proceeding. The NPRM seeks comments on several
aspects of the Federal Communications Commission
("Commission") proposal for initiating the Digital
Television ("DTV") service.

The NPRM proposes a tentative Draft DTV Table of
Allotments. The Draft Table proposes to assign DTV
Channel 18 to Station WJYS-TV. At the same time, the
NPRM proposes to assign DTV Channel 19 to Station
WJN-TV, Chicago. The transmitting sites of the two
stations, which would be operating on first-adjacent

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channels, are 28 miles apart. (See attached Engineering Statement.)

This proposed separation would be prohibited under the Commission's proposal for future DTV allotments because of well-founded concerns about potential interference between stations operating on first-adjacent channels.¹ The Commission has long recognized that the potential for interference is minimized by co-location of stations operating on first-adjacent channels.

In order to minimize the potential for interference between WJYS and WGN, Jovon would support the proposed transition of WJYS-TV to Channel 18 so long as WJYS were permitted to relocate to the WGN-TV site at the John Hancock Center in Chicago, or the nearby Sears Tower. Not only would such a move be consistent with the Commission's goal of facilitating co-location of first-adjacent channel stations, but would not be detrimental to any other licensees in the area² or to the public interest in any respect -- in fact, if it

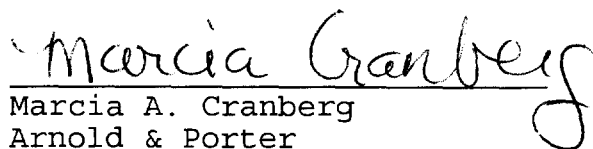
¹ See NPRM at ¶92, in which the Commission proposes to prohibit DTV adjacent-channel allotments between 20 and 55 miles apart.

² Jovon's engineers are of the opinion that such a move would not create additional interference to any other NTSC or proposed DTV facility. See attached Engineering Statement.

were to relocate, WJYS-TV could better serve the public by providing service to a greater area than at present.

Accordingly, Jovon currently supports the proposal to assign Channel 18 to WJYS-TV subject to the caveat that WJYS-TV be permitted to relocate to or near the WGN-TV transmitter site. Given the tentative nature of the Draft Table, should the Commission modify the Draft Table in a fashion which impacts upon WJYS-TV, Jovon reserves the right to withdraw its support expressed herein.

Respectfully submitted,



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Jovon Broadcasting
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Date: November 22, 1996

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of JOVON BROADCASTING CORPORATION, licensee of Television Station WJYS, Channel 62, Hammond, Indiana, in support of its Comments regarding the Commission's *Sixth Further Notice of Proposed Rule Making* concerning the assignment of digital television (DTV) channels to existing television (NTSC) broadcasters.

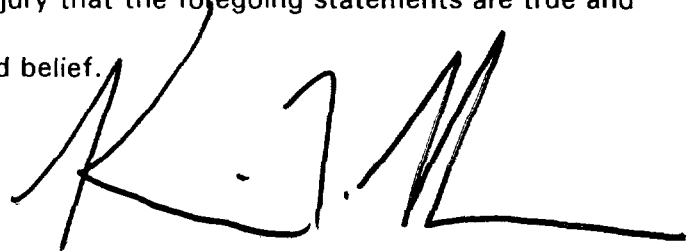
In its *Sixth Further Notice*, the FCC proposes to assign a DTV channel to each of the existing NTSC television stations. Specifically, the Commission proposes to assign DTV 18 to WJYS. A spacing study reveals that this channel is acceptable, with one caveat.

DTV Channel 19 appears in the table as assigned to WGN-TV, NTSC Channel 9, Chicago, Illinois. WGN-TV operates from John Hancock Center, some 28 miles from the transmitting site of WJYS. In order to minimize the interference between DTV Channels 18 and 19, it is respectfully requested that the WJYS DTV channel be allowed to be implemented from Sears Tower or John Hancock Center. The Commission has stated that the most effective way to minimize first-adjacent-channel interference to and from DTV operations is to colocate the two facilities wherever possible.

It is believed that WJYS can operate from either location and not cause or receive any significant amount of interference to any DTV or NTSC facility. In addition, it is believed that a City Grade signal over the city of Hammond can be broadcast from these locations. As a result, it is also requested that the WJYS DTV power level be

adjusted in order to account for the location on the Sears Tower or John Hancock Center.

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read 'K. T. Fisher', with a stylized, elongated final stroke.

KEVIN T. FISHER

November 18, 1996